

[1] **T. Snyder**
[2] part of the Suffolk County production,
[3] civil service production.
[4] **MR. NOVIKOFF:** I don't know
[5] what this is yet, so that's why I'm
[6] asking the witness. So let's look
[7] at — let's mark this as Snyder-8.
[8] Snyder-7.
[9] (Letter Dear Sir from Concerned
[10] Citizen of Ocean Beach was marked as
[11] Snyder Exhibit-7 for identification;
[12] 9/24/08, E.L.)
[13] **Q:** Now I'm going to show you what is
[14] referred to or marked as Snyder-7. Please
[15] feel free to show it to your counsel and
[16] tell me when you're ready to answer my
[17] questions.
[18] **A:** (Reviewing). Okay.
[19] **Q:** Is this the letter that you were
[20] referring to?
[21] **A:** Yes, this is it.
[22] **Q:** Is there any handwriting on that
[23] letter?
[24] **A:** Not handwriting on the letter,
[25] but on the envelope there was.

Page 63

[1] **T. Snyder**
[2] individuals involved in the alleged
[3] Halloween incident, right?
[4] **A:** Yes, I did.
[5] **Q:** And Mr. Hesse said he would look
[6] into it?
[7] **A:** He did say he would look into it,
[8] yes.
[9] **Q:** Okay. And then when did you
[10] speak to Mr. Paridiso about this letter?
[11] **A:** Soon after I spoke to George
[12] Hesse about it.
[13] **Q:** The next day?
[14] **A:** It was within a day or two.
[15] **Q:** Did Mr. Hesse attempt to prevent
[16] you from talking to Mr. Paridiso about this?
[17] **A:** No, he did not.
[18] **Q:** And how did you go about tracking
[19] down Mr. Paridiso to talk to him about this
[20] letter?
[21] **A:** I saw him at work while I was —
[22] he was coming on duty and I was going off.
[23] **Q:** Okay. Was it common for
[24] Mr. Paridiso to come on duty while you were
[25] going off duty?

Page 65

[1] **T. Snyder**
[2] **Q:** Okay. So when you made reference
[3] to handwriting in response to my prior
[4] answer, you were referring to what was on —
[5] **A:** Yes.
[6] **Q:** On the envelope?
[7] **A:** On the envelope of the letter.
[8] **Yes.**
[9] **Q:** Okay. Fine. We don't need to go
[10] over that document anymore. Okay. So you
[11] told Mr. Hesse about this letter and he said
[12] he'd speak — he would speak to the
[13] individuals or he would investigate, what
[14] did Mr. Hesse say to you?
[15] **A:** I don't recall exactly what he
[16] said, but it was along the lines of I felt
[17] it came from the individuals involved in the
[18] Halloween incident, it was soon after the
[19] incident, and they were concerned about how
[20] we investigated it. They thought that we
[21] were trying to jam them up as they put it.
[22] **MO MR. NOVIKOFF:** Motion to strike
[23] as nonresponsive.
[24] **Q:** You spoke to Mr. Hesse and said
[25] you believed that this letter came from the

Page 64

[1] **T. Snyder**
[2] **A:** It happened on a number of
[3] occasions, yeah.
[4] **Q:** Okay. Well, how often?
[5] **A:** Depending on if I worked the
[6] midnight to 8:00 tour and he was working
[7] 8:00 to 4:00. Sometimes we would see each
[8] other.
[9] **Q:** Okay. And what did Mr. Paridiso
[10] say?
[11] **A:** I had told him about the letter.
[12] He looked at it and he frowned and said that
[13] he would speak as well.
[14] **Q:** And did Mr. Paridiso ever get
[15] back to you with regard to your inquiry with
[16] him concerning this letter?
[17] **A:** He said that he would — we would
[18] have a meeting about it with the individuals
[19] that we suspected, and I said okay.
[20] **Q:** Now did this take place — well,
[21] now I'm a little confused. You — you
[22] reached out to Ed Paridiso to show him the
[23] letter?
[24] **A:** Um-hum.
[25] **Q:** You say Mr. Paridiso frowned and

Page 66

[1] **T. Snyder**
[2] Q: Okay. Anything else you said to
[3] him in this phone conversation?
[4] A: I don't recall. I think it was
[5] just specifically about that letter.
[6] Q: And did he tell you to come on in
[7] and talk to him?
[8] A: Actually, he came to my house.
[9] He drove to my house and picked the letter
[10] up.
[11] Q: That day?
[12] A: No. But it was a day or two
[13] after.
[14] Q: And did you talk to him when he
[15] came to your house to pick it up?
[16] A: Very briefly.
[17] Q: What was the sum and substance of
[18] the conversation?
[19] A: I showed him the envelope. I
[20] showed him the letter. He looked at it. He
[21] made me sign, initial, both of them, and he
[22] took it from me and that was it.
[23] Q: Okay. And when was the next time
[24] you had any type of communication with the
[25] District Attorney's office?

Page 71

[1] **T. Snyder**
[2] A: I'm not sure when, but it was
[3] some — a long period after that.
[4] Q: Months? Years?
[5] A: I think it was months after that.
[6] Q: And who initiated this
[7] communication?
[8] A: I don't recall if it was them or
[9] me.
[10] Q: And what was the sum and
[11] substance of this communication?
[12] A: In this instance, I think it was
[13] more to — there was a new ADA on the case,
[14] Robert Biancavilla, and I think he wanted
[15] just to meet me because of the whole
[16] incident that they were investigating, so he
[17] had never saw me or talked to me, so.
[18] Q: And did you in fact meet with
[19] this new ADA on the case?
[20] A: Yes. Very briefly.
[21] Q: By phone or in person?
[22] A: No. In person.
[23] Q: Where?
[24] A: At the DA's office.
[25] Q: And what was the sum and

[1] **T. Snyder**
[2] substance of the conversation?
[3] A: He just asked how long I was
[4] working there, and you know, basically some
[5] of the same questions. He said, "I had
[6] never met you. I want to talk to you. I
[7] want to meet you."
[8] Q: Okay. Same questions as were
[9] asked in your first meeting with the DAs?
[10] A: Yes. Very similar.
[11] Q: And how long did this meeting
[12] take place?
[13] A: It didn't take long at all. It
[14] was maybe 20 minutes tops.
[15] Q: Okay. And had you filed the
[16] complaint by this time in this matter?
[17] A: Yes. I believe the complaint was
[18] filed by that time.
[19] Q: And did he ask you any questions
[20] about any of your allegations in the
[21] complaint?
[22] A: He asked me about the Halloween
[23] incident. He asked about how long I was
[24] working there. He stated to me that,
[25] "You're, you know, you're an old timer."

Page 72

[1] **T. Snyder**
[2] You've been there a long time." He asked if
[3] I knew anything about beatings that had
[4] taken place. Some of the prior beatings
[5] that apparently were coming to light.
[6] MR. NOVIKOFF: Okay. And —
[7] well, I'm actually going to move to
[8] strike that answer because my question
[9] was about did he ask you — no.
[10] Withdrawn. I'm not going to move to
[11] strike that answer.
[12] Q: Was that the last conversation
[13] you had with anyone from Ocean — from the
[14] DA's office concerning Ocean Beach?
[15] A: Yeah, I believe that's correct.
[16] I don't believe I've talked to them since.
[17] Q: Have you ever testified before a
[18] grand jury?
[19] A: I have —
[20] MR. GOODSTADT: In connection
[21] with Ocean Beach?
[22] Q: In connection with Ocean Beach?
[23] A: No, I have not.
[24] Q: Are you aware if any of the other
[25] Plaintiffs have testified before a grand

Page 73

[1] **T. Snyder**
[2] Q: Okay. So if I — just so, if I
[3] understand, you would have learned this fact
[4] while your attorney was present during a
[5] conversation?
[6] MR. GOODSTADT: Objection.
[7] MR. NOVIKOFF: I just want to
[8] be clear. I'm not going to ask him who
[9] said what.
[10] MR. GOODSTADT: I understand,
[11] but just the fact that the topic was
[12] discussed I think is privilege. I
[13] think that you have the information you
[14] need on the question without going any
[15] further.
[16] MR. NOVIKOFF: I just want to
[17] be sure that it was he learned it
[18] during —
[19] MR. GOODSTADT: Well, if you
[20] asked if he learned it during the
[21] conversation, doesn't that encroach
[22] upon what we discussed or may have
[23] discussed? He told you he did not
[24] learn outside the presence of his
[25] attorney.

Page 79

[1] **T. Snyder**
[2] recording.
[3] Q: How did it come — well, did you
[4] discuss suing Ocean Beach at any point in
[5] time prior to retaining — prior to meeting
[6] Mr. Goodstadt's law firm?
[7] MR. GOODSTADT: Objection.
[8] Q: Outside the presence of any other
[9] attorneys?
[10] MR. GOODSTADT: I just want
[11] to —
[12] MR. NOVIKOFF: I'll break it
[13] down. I'll break the question down.
[14] Q: Putting aside any communications
[15] you may have had in the presence of
[16] Mr. Goodstadt and his office and putting
[17] aside any communications you may have had
[18] with any other lawyer or law firm, did you
[19] have any communications with any of the
[20] other Plaintiffs concerning filing a lawsuit
[21] against Ocean Beach after April 2, 2006?
[22] A: Yes. One instance.
[23] Q: When was that instance?
[24] A: The day before I met my
[25] attorneys.

Page 81

[1] **T. Snyder**
[2] MR. NOVIKOFF: Fair enough.
[3] Okay.
[4] Q: And did you ever learn that Lamm
[5] had tape recorded conversations?
[6] A: Again, it would be the same
[7] situation. It would be in the presence of
[8] my attorneys.
[9] MR. GOODSTADT: Again, don't —
[10] just — it's the same situation.
[11] Q: How about Fiorillo, did you ever
[12] become aware of the fact that Fiorillo had
[13] taped any conversation?
[14] A: I'm not aware —
[15] MR. GOODSTADT: Objection.
[16] That's assuming a fact.
[17] Q: Are you aware if Fiorillo has
[18] ever tape recorded a conversation?
[19] MR. GOODSTADT: That's a
[20] different question.
[21] A: I'm not aware if Frank ever
[22] recorded.
[23] Q: Are you aware if Nofi ever tape
[24] recorded a conversation?
[25] A: I'm not aware of — of Nofi ever

Page 80

[1] **T. Snyder**
[2] Q: Okay. Who did you have a
[3] conversation with?
[4] A: With Ed Carter.
[5] Q: And what did you and Mr. Carter
[6] talk about?
[7] A: Eddie had called me. I was home
[8] sick in bed. He called me and said that —
[9] that the four of us were going to go meet
[10] with attorneys, and he thought it would be
[11] wise if I came along as well because I'm
[12] part of a lot of the events that are
[13] occurring there, and I just recently was
[14] fired as well, along with them.
[15] Q: How long after the date that you
[16] just say you were fired did Carter have this
[17] phone call with you?
[18] A: It was within a week.
[19] Q: So within the — just so I'm
[20] clear then, within a week of April 2,
[21] 2000 —
[22] A: Wait. I'm — I'm wrong. It
[23] wasn't within a week. It was actually — it
[24] was after that.
[25] Q: Well, it was certainly after you

Page 82

[1] **T. Snyder**
[2] A: Yeah. I'm not sure. I don't
[3] recall their names.
[4] Q: Okay. And these women knew that
[5] you had applied to be promoted?
[6] A: They knew that we had taken a
[7] promotional exam and that it was recently
[8] scored and that we — myself and Eddie as
[9] well were up for a promotion.
[10] Q: Okay. And how would these women
[11] know that, according to your knowledge?
[12] A: Well, I would assume that the
[13] records from your promotional exam would
[14] come from civil service to the Town of Islip
[15] personnel department.
[16] Q: I'm asking you, how do you know
[17] that these women specifically knew that you
[18] had taken a test to be promoted?
[19] MR. GOODSTADT: He just
[20] testified to —
[21] Q: Without assuming, what is your
[22] knowledge, other than an assumption?
[23] A: That's — my knowledge is that
[24] that's how it would — they request the
[25] test, the town requests the tests through

Page 87

[1] **T. Snyder**
[2] A: No, they did not.
[3] Q: Did any of these women advise you
[4] that they had seen a piece of paper in which
[5] George Hesse had called you a rat?
[6] A: No, they did not.
[7] Q: Who are your superiors at the
[8] Town of Islip at this time?
[9] A: At this time, the assistant
[10] director to parks and recreation, George
[11] Schimpf. It's S-C-H-I-M-P-F.
[12] Q: Okay.
[13] A: He was the — well, he still is
[14] the assistant. He's running the department
[15] now. The director is — is no longer there.
[16] Q: At the time these women that you
[17] can't identify made whatever statements they
[18] made to you, who was your superior?
[19] A: Marty Raber. He was the
[20] executive assistant to the Town of Islip
[21] supervisor, Pete McGowan.
[22] Q: Did any of these women ever tell
[23] you that Mr. Raber had told them that George
[24] Hesse had said to Mr. Raber you were a rat?
[25] A: No, they did not.

Page 89

[1] **T. Snyder**
[2] Suffolk County and Suffolk County posts, and
[3] you go take the test and then the results
[4] get brought back to the town.
[5] Q: The — some of the women that you
[6] referred to that you can't identify by name,
[7] did any of them tell you "I know that you
[8] just took a test" —
[9] A: No.
[10] Q: — "to be promoted"?
[11] A: Not directly. No.
[12] Q: Okay. Did anyone — did any of
[13] these "some of the women" that you testified
[14] to advise you that they were aware that you
[15] were up for a promotion?
[16] A: Um, they said that they knew
[17] people in the department were up. Not me
[18] specifically, no.
[19] Q: Okay. Fine. Now did any of
[20] these women that you can't name, advise you
[21] that they were told by George Hesse —
[22] A: No.
[23] Q: — that you were a rat?
[24] MR. GOODSTADT: Let him finish
[25] the question.

Page 88

[1] **T. Snyder**
[2] Q: Did any of these women that you
[3] can't identify ever advise you that George
[4] Hesse had advised George Schimpf that you
[5] were a rat?
[6] A: No, they did not.
[7] Q: Did Raber ever advise you that
[8] George Hesse had told you — that had told
[9] him that you were a rat?
[10] A: No, he did not, but he did
[11] know — he did know that we were fired from
[12] Ocean Beach and he knew the situation.
[13] MO MR. NOVIKOFF: Motion to strike
[14] as not responsive.
[15] Q: I'll ask the question again. Did
[16] Mr. Raber ever advise you that George Hesse
[17] had told him that you were a rat?
[18] A: No, he did not.
[19] Q: Did Mr. Schimpf ever advise you
[20] that George Hesse had told him that you were
[21] a rat?
[22] A: No, he did not.
[23] Q: Now when you make reference to "a
[24] reference" in paragraph 109, what
[25] specifically are you referring to?

Page 90

[1] *T. Snyder*
[2] what do you mean?
[3] A: He heard the rumors from the
[4] officers down at the harbor master's office
[5] where George worked for the town part time.
[6] Q: Okay. How did Craig Cain —
[7] A: The same thing.
[8] Q: Hold on. You got to let me
[9] finish the question. Did Craig Cain ever
[10] advise you that he had spoken to George
[11] Hesse about you?
[12] A: No, he did not.
[13] Q: Okay. Did Tony Riccardi ever
[14] advise you that he had spoken to George
[15] Hesse about you?
[16] A: No, he had not.
[17] Q: Did any person that you worked
[18] with in your department as you use that
[19] phrase, ever advise you that they had spoken
[20] with George Hesse?
[21] A: No, they had not.
[22] Q: Okay. Let's talk about the
[23] harbor master department. Who works
[24] at the — who worked between April 2006 and
[25] today at the harbor master's department?

Page 95

[1] *T. Snyder*
[2] to me directly, no.
[3] Q: Did Bobby Sgroi ever advise you
[4] that George Hesse had spoken to him about
[5] you after you say you were fired from Ocean
[6] Beach in 2006?
[7] A: He says he spoke to him, but he
[8] wanted to stay out of it.
[9] Q: Okay. So Sgroi said he talked to
[10] Hesse, but he didn't tell you what was said?
[11] A: Right. He wouldn't — he said he
[12] wanted to remain neutral because he liked me
[13] and he liked George and he didn't want to be
[14] involved in it.
[15] Q: So he didn't tell you anything
[16] about their conversation?
[17] A: No, he didn't. There's also —
[18] Q: Hold on. Hold on.
[19] MR. GOODSTADT: He was still
[20] answering the question.
[21] MR. NOVIKOFF: No. My question
[22] was specific did Bobby Sgroi. If the
[23] answer is going to be about what Bobby
[24] Sgroi said to you, then by all means
[25] continue. If it's not, then I don't

Page 97

[1] *T. Snyder*
[2] A: I don't know the guy's name
[3] specifically. They have some new officers
[4] now, but I know Bobby Sgroi was one of the
[5] officers that George worked with. He's now
[6] running the department down there, and Alan
[7] Loeffler at the time was also down there.
[8] Q: Well, when — when did Alan
[9] Loeffler stop being down there?
[10] A: When he retired I want to say
[11] 2006. Sometime in 2006 he retired.
[12] Q: Did he retire before or after you
[13] were told you were no longer working there?
[14] A: He retired and then came back
[15] pending a waiver or something to that
[16] effect. I'm not sure, though.
[17] Q: Well, did you speak to Alan
[18] Loeffler concerning anything that George
[19] Hesse said to him, if anything?
[20] A: I spoke to him, but not directly
[21] about that. No.
[22] Q: Okay. Did Alan Loeffler ever
[23] advise you that George Hesse said anything
[24] to him concerning you?
[25] A: He never spoke — he never said

Page 96

[1] *T. Snyder*
[2] need to hear it.
[3] MR. GOODSTADT: We'll put it in
[4] an affidavit then. That's fine.
[5] Q: Is your answer going to be what
[6] Bobby Sgroi said to you?
[7] A: No.
[8] Q: Okay. Then did anyone else who
[9] worked for the harbor master department
[10] between April 20, 2006 and the present day,
[11] tell you that they have spoken to George
[12] Hesse?
[13] A: Um, no, they have not. Not in
[14] reference to me.
[15] Q: Right. Who at the Town of Islip
[16] has advised you that they have spoken with
[17] George Hesse?
[18] A: Um, other than Bobby Sgroi and
[19] Alan, because he worked with Alan, I'm not
[20] sure. There may be other people. He did —
[21] he did work there.
[22] Q: That's not my question, sir, and
[23] I don't even know if you've told me that
[24] Alan Loeffler told you that he spoke to
[25] George Hesse about it, so I'll ask that

Page 98

[1] *T. Snyder*

[2] A: Yes, I did.
[3] Q: And —
[4] A: Their —
[5] Q: Hold on. Which supervisor or
[6] supervisors have you asked?
[7] A: Both Marty Raber and George
[8] Schimpf.

[9] Q: And when did you talk to
[10] Mr. Raber about why you were not promoted or
[11] have not been promoted?
[12] A: It would have to be prior to him
[13] leaving, so it would be after the results of
[14] the test came back, between September of '06
[15] and December of '06 when he left.

[16] Q: And when — and what did he say?
[17] A: He said, "I made my
[18] recommendations and that's it." He put his
[19] hand up. He didn't want to talk.
[20] Q: And did he say he made — did he
[21] say he recommended you?
[22] A: He just said, "I made my
[23] recommendations." He didn't want to talk.
[24] Q: How about Schimpf, have you ever
[25] spoke to Schimpf about the fact that you

Page 103

T. Snyder

[1] [2] Raber said, "I've made my recommendations,"
[3] and he didn't want to talk about it either.
[4] Q: Okay. Let's look at the next
[5] sentence of paragraph 109. Well, actually,
[6] the next sentence doesn't refer to you, does
[7] it?

[8] MR. GOODSTADT: Objection.
[9] A: No, it doesn't.
[10] Q: Do you have any knowledge one way
[11] or the other as to what — as to the basis
[12] of Mr. Carter's allegation?
[13] A: Not direct knowledge.
[14] Q: Just through what Mr. Carter told
[15] you?

[16] A: Yes.
[17] Q: Okay. Let's look at paragraph
[18] 110, "upon information and belief, Hesse
[19] circulated false and malicious negative
[20] references concerning Plaintiffs among
[21] officials working for the Town of Islip," do
[22] you see that?
[23] A: Yes, I do.
[24] Q: What do you mean by the word
[25] "circulated"?

Page 105

[1] *T. Snyder*

[2] have yet to be promoted to sergeant?
[3] A: Yes. And within the last year.
[4] Yeah.
[5] Q: Was that after you filed the
[6] lawsuit?
[7] A: Yes.
[8] Q: And was that after you had the
[9] press conference?
[10] A: Yes.
[11] Q: Was that after Newsday had run an
[12] article, at least one article concerning
[13] this?
[14] A: Yes.

[15] Q: Was that after News 12 had run at
[16] least one story about this?
[17] A: Yes. I believe so. Yes.
[18] Q: Was it after a number of other
[19] television stations and media outlets had
[20] run stories about this?
[21] A: I believe so. Yes.
[22] Q: And what did Mr. Schimpf say to
[23] you when you inquired with him as to why you
[24] had yet to be promoted?
[25] A: He said the same thing that Marty

Page 104

T. Snyder

[1] [2] A: Spread rumors. Discussed our
[3] employment and our firing with them.
[4] Q: Okay. So you understand
[5] "circulated" to being spreading rumors and
[6] discussing the reasons for your terminations
[7] with officials working for the Town of
[8] Islip?
[9] A: Yes.
[10] Q: Okay. What officials?
[11] A: The same ones we just talked
[12] about. This is —
[13] Q: Schimpf and —
[14] A: And Raber.
[15] Q: Okay.
[16] A: Um, among others.
[17] Q: Well, that's what I'm trying to
[18] find out.
[19] A: I would imagine Bobby Sgroi.
[20] Q: I don't want you to imagine. I
[21] want you to advise me when you made the
[22] allegation of "officials," what officials
[23] were you referring to. So you got Raber,
[24] you got Schimpf?
[25] A: Right.

Page 106

Page 111

[1] *T. Snyder*

[2] Q: Have you ever looked at your
[3] civil service records?

[4] MR. GOODSTADT: Objection.

[5] A: I have never seen it, no. Not
[6] with civil service, no.

[7] Q: Have you ever sought to look at
[8] your civil service records?

[9] A: Um, well, I guess in a way I did
[10] when I called the state retirement system
[11] and asked them when was the last day I was
[12] registered as a police officer.

[13] Q: When did you call them?

[14] A: Soon after I was fired.

[15] Q: Okay.

[16] A: And they stated to me that they
[17] had me last working as a police officer in
[18] Ocean Beach on March 31, 2006.

[19] Q: Okay. What were the false —
[20] well, then, sir, to your knowledge, what
[21] document has been inserted into your civil
[22] service records that contain a false and
[23] damaging and baseless allegation?

[24] A: I would imagine when George Hesse
[25] talked to Alison Sanchez in civil service

Page 113

T. Snyder

[1] that you claim went to civil service that
[2] contains a false, damaging and baseless
[3] allegation from Mr. Hesse?

[4] A: I don't recall seeing one, no.

[5] Q: Okay. And what is the basis for
[6] your belief or — withdrawn. What is the
[7] basis for your imagination that subsequent
[8] to April 20, 2006, Mr. Hesse spoke with
[9] Ms. Sanchez?

[10] MR. GOODSTADT: Objection.

[11] Q: Concerning you?

[12] MR. GOODSTADT: Objection.

[13] A: When I called the retirement
[14] system and found out that I was fired and I
[15] was fired prior to I was notified being
[16] fired.

[17] Q: All right. Well, did that

[18] department that you spoke to say that Hesse
[19] spoke to Sanchez?

[20] A: No. They said that they received
[21] documents from Ocean Beach and from Suffolk
[22] County Civil Service saying that I was no
[23] longer employed as a police officer.

[24] Q: So my question to you, sir, what

Page 112

T. Snyder

[1] and said that he was firing us, that that
[2] would be the false and malicious
[3] allegations.

[4] Q: You imagine?

[5] A: Well, he did — he did say that
[6] we were — that we were rats and we were
[7] being fired because of it.

[8] MO MR. NOVIKOFF: Motion to
[9] strike, sir.

[10] Q: You just said you imagine. Other
[11] than your imagination, can you tell me what
[12] specific document you are aware of that
[13] Mr. Hesse has sent to civil service that
[14] contains a false, damaging and baseless
[15] allegation?

[16] MR. GOODSTADT: Objection.

[17] A: He spoke to Alison Sanchez. I
[18] know he submitted documents upon our firing
[19] of why we were being fired. So I would
[20] assume in those documents that that's where
[21] it's written.

[22] MO MR. NOVIKOFF: Motion to
[23] strike.

[24] Q: Have you ever seen a document

Page 114

T. Snyder

[1] evidence can you point to — well,
[2] withdrawn. My question then is, what is the
[3] basis for your belief that Sanchez and Hesse
[4] ever spoke about you after April 20, 2006?

[5] A: It would be within those
[6] documents that — after April 20, 2006?

[7] Q: Yes.

[8] A: I'm not aware of them speaking

[9] after April 20, 2006.

[10] Q: Okay. Then what is the basis for
[11] your belief that they had spoken about your
[12] termination after April 2, 2006?

[13] A: I'm not aware they spoke before
[14] April 2. I assume they spoke before —
[15] prior to that, because apparently I was
[16] fired before I was notified I was fired.

[17] Q: What makes you believe that Hesse
[18] notified Sanchez prior to April 2, 2006 that
[19] you in your words were being fired?

[20] A: I believe in some of the
[21] documents in discovery we got from civil
[22] service department shows that they had
[23] regular communication.

[24] Q: Concerning why you were fired?

[1] **T. Snyder**
[2] Q: Okay. They didn't tell you that
[3] they had spoken to Hesse, did they?
[4] A: No. They wouldn't talk about it.
[5] They did — they did mention to me about the
[6] Ocean Beach incident, though. Or Ocean
[7] Beach. That I was a former employee there.
[8] Q: Well, did you disclose to them on
[9] the application that you were a former
[10] employer?
[11] A: On my —
[12] Q: That you were a former employee?
[13] A: On my resume, yes.
[14] Q: Okay. And who did you speak to
[15] there?
[16] A: Um, the director. I don't recall
[17] his name right now, but the director of that
[18] safety and security division. Bob. I'm not
[19] sure his last name right now.
[20] Q: And what is — was it Bob that
[21] spoke to you about Ocean Beach?
[22] A: Yes, he did.
[23] Q: And what did he say to you?
[24] A: He asked me — when he saw my
[25] resume, he asked me, "Are you one of those

Page 119

[1] **T. Snyder**
[2] guys that's involved in all the beatings
[3] over there?" I said, "No."
[4] Q: Okay. Did he say anything else
[5] about Ocean Beach?
[6] A: He asked why I was fired.
[7] Q: Okay. Anything else about Ocean
[8] Beach?
[9] A: That was it really.
[10] Q: Okay. So let me just — just so
[11] we're all clear and understand. Bob, the
[12] director of John T. Mather Memorial
[13] Hospital, during an interview for you — of
[14] you for a position that you applied for in
[15] or about June of '07, asked you if you were
[16] one of the officers involved in the beatings
[17] at Ocean Beach; is that correct?
[18] A: Yes.
[19] Q: And you answered him no?
[20] A: Right.
[21] Q: On that subject, did he ask you
[22] any other questions? "The subject" being
[23] what he labeled the beatings at Ocean Beach?
[24] A: He didn't ask any questions. He
[25] just — that was it. He just went on to the

Page 120

T. Snyder

[1]
[2] next —
[3] Q: Right. He asked you a question
[4] if you were involved?
[5] A: Right.
[6] Q: And you said no?
[7] A: I said, "No, I was not." "I
[8] wasn't one of the bad cops," I said.
[9] Q: And on that issue, there was no
[10] further discussion?
[11] A: No.
[12] Q: And you made specific reference
[13] to bad cops in your answer?
[14] A: That was my answer to him. I
[15] said, "I was not — I'm not one of the bad
[16] cops over there, I'm one of the good cops."
[17] Q: Okay. And then the next issue
[18] that he asked you about in — concerning
[19] Ocean Beach was why you were fired?
[20] A: Yeah. We discussed it.
[21] Q: Well, what did he specifically
[22] ask you?
[23] A: He asked why I was fired.
[24] Q: And what did you say to him?
[25] A: I told him I was fired because

Page 121

T. Snyder

[1]
[2] the — the sergeant at the time, George
[3] Hesse, my supervisor at the time, decided
[4] that I was a rat.
[5] Q: So you —
[6] A: So I said —
[7] Q: Hold on. Just so I'm clear, you
[8] said initially in response to his question
[9] about why you were fired, you said that
[10] George Hesse, who was your supervisor at the
[11] time?
[12] A: I said — yeah, my supervisor.
[13] Right.
[14] Q: Your supervisor at the time
[15] decided that you were a rat?
[16] A: He — that's what he said to me.
[17] I was a rat.
[18] Q: Okay. Fine. And did you say
[19] anything else to the director of security at
[20] the hospital before he asked you any
[21] follow-up questions about that?
[22] A: No. That's when I said, "I'm not
[23] one of the bad guys over there, I'm one of
[24] the good guys." That's — that's how I
[25] followed up. And he said, "Okay."

Page 122

[1] **T. Snyder**
[2] Sometime after. Shortly after that.
[3] Q: And then you met with him?
[4] A: Yes.
[5] Q: And he stated to you at the
[6] beginning of this meeting that they're not
[7] hiring?
[8] A: He — he took my resume. I told
[9] him who I was, and he looked at me, and he
[10] says, "Well, we're not hiring at this time."
[11] Q: Okay. And that was the extent of
[12] your conversation?
[13] A: That was the first time, yes.
[14] Q: And you said thank you very
[15] much —
[16] A: And I walked out.
[17] Q: — and you went on your way?
[18] A: Yes.
[19] Q: Okay. And then what caused you,
[20] if anything, to resubmit your application
[21] or — or seek employment again for the
[22] hospital?
[23] A: I just wanted to go back there
[24] and try it again.
[25] Q: Okay. And so how did you go

Page 127

[1] **T. Snyder**
[2] headline news.
[3] Q: Okay. So you went to the
[4] hospital. You got to see the director.
[5] Apparently he didn't recognize you from the
[6] last time?
[7] A: It didn't appear to me he did.
[8] Q: And you had a conversation with
[9] him? An interview with him, right?
[10] A: At that time, yes, I did.
[11] Q: And this is where he asked you if
[12] you were one of the cops involved in the
[13] beating —
[14] A: Right.
[15] Q: — that we talked about, and he
[16] also asked you why you were terminated and
[17] we talked about that, right?
[18] A: Yes.
[19] Q: Okay. Were you given — were you
[20] offered the job at that interview?
[21] A: Yes, I was, at the end of the
[22] interview.
[23] Q: Okay. How did he go about
[24] offering you the job?
[25] A: He said, "Well, this is what —

Page 129

[1] **T. Snyder**
[2] about that?
[3] A: I — I did the same thing again.
[4] I called up and made an appointment.
[5] Apparently, he — he must not have
[6] recognized that I was the same guy he talked
[7] to.
[8] Q: Okay. So he did meet with you
[9] this time?
[10] A: The second time, yeah.
[11] Q: The second time. Now in the
[12] first time in June, was the Gilbert case in
[13] the papers, to your knowledge?
[14] A: Oh, short — before that. It
[15] happened in August of '05.
[16] Q: Okay.
[17] A: Or September of '05.
[18] Q: But you just testified, though,
[19] that it was in the newspapers when you were
[20] interviewing?
[21] A: Well, it was prior to that.
[22] Q: Oh, okay.
[23] A: And then the whole scandal with
[24] the DA saying he's investigating Ocean Beach
[25] was in December of '05. There was a big

Page 128

[1] **T. Snyder**
[2] this is the opening I have. You know, can
[3] you do this?"
[4] Q: Okay.
[5] A: And I said, "I will fit it into
[6] my schedule. Yeah, I will do it. I need
[7] the job."
[8] Q: And how much do you earn?
[9] A: \$13 and change an hour.
[10] Q: And how many hours do you work
[11] per week?
[12] A: Every other week, a total of
[13] seven and a half, so we're talking what, 15
[14] hours every other week.
[15] Q: Okay. So if I understand your
[16] testimony correctly, after you had discussed
[17] whether or not you were one of the cops
[18] involved in the beating at Ocean Beach, and
[19] after you had specifically told him that
[20] your supervisor had called you a rat, this
[21] director of security for the John T. Mather
[22] Memorial Hospital hired you?
[23] A: Yeah, he did.
[24] Q: Okay.
[25] A: I told him I wasn't one of the

Page 130

[1] **T. Snyder**

[2] month —

[3] **MR. GOODSTADT:** Objection.

[4] **Q:** Well, when were these park

[5] rangers hired?

[6] **A:** Within the last month it was —

[7] they just got hired.

[8] **Q:** Okay. So other than the 10 that

[9] were hired within the last month, are you

[10] aware of any other park rangers that were

[11] hired between the date of your application

[12] and last month?

[13] **A:** No, I'm not aware.

[14] **MR. NOVIKOFF:** Okay. Let's

[15] mark the next document as Snyder-8.

[16] (Application for Town of

[17] Brookhaven was marked as Snyder

[18] Exhibit-8 for identification;

[19] 9/24/08, E.L.)

[20] **A:** (Reviewing).

[21] **Q:** Sir, do you recognize Snyder-8?

[22] **A:** Yes, I do.

[23] **Q:** And what is Snyder-8?

[24] **A:** This is the application I filled

[25] out for the — the position as a park

Page 135

T. Snyder

[1] supervisor.

[3] **Q:** Okay. So why didn't you put down

[4] Walter Muller?

[5] **A:** Because Walter Muller is not

[6] going to give me a reference. He's not

[7] running the department. Chief Paridiso was.

[8] **Q:** Why didn't you put Ed — why

[9] didn't you put — well, they weren't asking

[10] for a reference, were they? They were

[11] saying "state employment experience. Start

[12] with your present and last job, include

[13] military service and volunteer activities,"

[14] and then they write "employer" and you write

[15] what?

[16] **A:** What — what line are you looking

[17] at? I'm sorry.

[18] **Q:** Okay. I am looking at "employer

[19] name and address." You write "Incorporated

[20] Village of Ocean Beach," do you see that?

[21] **A:** Okay. Yes, I see that.

[22] **Q:** You then give a phone number.

[23] You then give how much you were making per

[24] hour?

[25] **A:** Yes. That's correct.

Page 137

[1] **T. Snyder**

[2] ranger.

[3] **Q:** And for the record, it's TOB0010

[4] to TOB0011, and you filled out this

[5] application on or about June 28, 2007?

[6] **A:** Yes, I did.

[7] **Q:** And you put down Ed Paridiso as

[8] your supervisor here?

[9] **A:** Yes. Because Ed Paridiso still

[10] technically was chief at Ocean Beach.

[11] **Q:** And was Ed Paridiso your

[12] supervisor while you worked at Ocean Beach?

[13] **A:** When I worked with him on his

[14] tour, yes, I was. Yes, he was. Excuse me.

[15] **Q:** Sir, what does that mean, when

[16] you worked with him on your tour? This —

[17] this question says "who is your supervisor,"

[18] you wrote "Ed Paridiso, chief." Was Ed

[19] Paridiso your supervisor throughout your

[20] tenure at Ocean Beach?

[21] **A:** He was one of my supervisors.

[22] There was another one. George Hesse was the

[23] second supervisor. And on occasions, Walter

[24] Muller, police officer, was designated as

[25] the duty officer, and he was also my

Page 136

T. Snyder

[1] **Q:** You then give your duties that

[3] you performed, right?

[4] **A:** Yes.

[5] **Q:** And then you write "supervisor,

[6] Ed Paridiso, chief," do you see that?

[7] **A:** Yes.

[8] **Q:** Why didn't you put Hesse down?

[9] **A:** Because —

[10] **MR. GOODSTADT:** Objection.

[11] **Q:** Hesse was your supervisor, right?

[12] **A:** He was the supervisor when I —

[13] when I worked underneath him in his tour,

[14] yes.

[15] **Q:** Did you ever —

[16] **A:** He was — at this point, he

[17] wasn't the chief, as far as I knew. The

[18] chief of police is the only one who can

[19] give — who could — they would want to

[20] speak to. They didn't want to speak to

[21] George Hesse.

[22] **Q:** You got it. Okay. You didn't

[23] put down your military experience, did you?

[24] **A:** No. I don't see anywhere on here

[25] where I had to fill it out.

Page 138